

## REMARKS

In an Office Action mailed on December 30, 2005, claims 15 and 54 were withdrawn from further prosecution as being allegedly drawn to a non-elected species; an objection was made to the Abstract due to the description of a non-elected species; and claims 1-5, 7-12, 14, 16-19, 22, 50-53, 55-60, 62-67 and 70 were rejected under 35 U.S.C. § 102(b) as being anticipated by van Zon.

The Abstract has been rewritten to overcome the corresponding objection. The § 102 rejections are addressed below.

### § 102 Rejections of Claims 1-5, 7, 11, 12, 14, 16, 18 and 22:

As amended, the apparatus of independent claim 1 includes a connector and a member. The connector connects a first tubing section and a second tubing section together. The connector includes a body that includes a first opening to receive the first tubing section and a second opening to receive the second tubing section. The body also includes a passageway. The member is adapted to be moved from a retracted position to an extended position to form a sealed connection between a tubular member that is connected to the first tubing section and the passageway.

Contrary to the limitations of amended independent claim 1, van Zon discloses sealing rings, such as sealing ring 5, forms seals between support tubes 20. This sealing ring 5 is located inside the support tubes, as depicted in Fig. 1, for example. van Zon also discloses a coupling ring 22.

However, van Zon fails to teach or even suggest a connector that connects a first tubing section and a second tubing section together, where the connector includes a body that includes a first opening to receive a first tubing section and a second opening to receive the second tubing section, and a passageway. Without this connector, van Zon fails to anticipate amended independent claim 1.

Thus, for at least this reason, withdrawal of the § 102 rejection of independent claim 1 in view of van Zon is requested. Claims 2-5, 7, 11, 12, 14, 16, 18 and 22 are patentable for at least the reason that these claims depend from an allowable claim.

§ 102 Rejections of Claims 50, 52, 53, 55-60, 62-67 and 70:

As amended, the method of independent claim 50 is usable with a well. The method includes connecting a first production tubing section to a second production tubing section. The method includes moving a member from a retracted position to an extended position to form a sealed connection between a first gravel packing transport tube that is connected to the first tubing section and a second gravel packing transport tube that is connected to the second tubing section.

Contrary to the limitations of amended independent claim 50, van Zon is directed to a sealing apparatus for a filtration unit. van Zon neither teaches nor even suggests a production tubing. Furthermore, van Zon neither teaches nor even suggests gravel packing transport tubes. Thus, for at least these reasons, van Zon fails to teach or suggest the acts of connecting and moving that are set forth in amended independent claim 50. As such, van Zon fails to anticipate this claim.

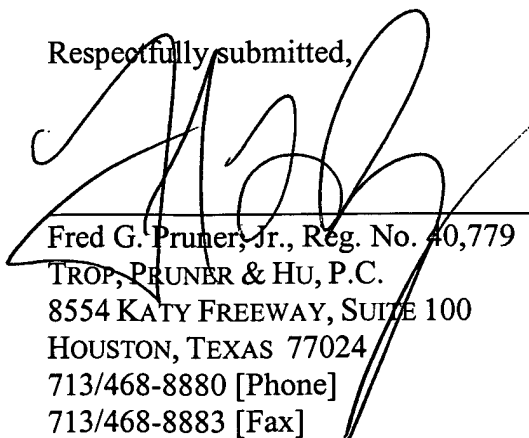
Claims 52, 53, 55-60, 62-67 and 70 are patentable for at least the reason that these claims depend from an allowable claim.

CONCLUSION

In view of the foregoing, withdrawal of the § 102 rejections and a favorable action in the form of a Notice of Allowance are requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0238US).

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Respectfully submitted,



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